

ATTACHMENT 1

Before the  
**FEDERAL COMMUNICATIONS COMMISSION**  
Washington, D.C. 20554

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In the Matter of the Joint Application of )

**Telecom North America Inc.**, Assignor )  
and )  
**G3 Telecom USA Inc.**, Assignee )

File No. ITC-ASG-2016\_\_\_\_\_

For Authority pursuant to Section )  
Section 214 of the Communications Act of 1934, )  
as amended, to Complete an Assignment of Assets )  
of Authorized Domestic and International Section )  
214 Carriers )

**Answer to Question 10:**

**Section 63.18(c)–Assignor and Assignee Contact Information**

**Assignor:**

Mr. Max Nokhrin  
Treasurer  
Telecom North America Inc.  
791-90 Eglinton Avenue East  
Toronto, Ontario  
Canada M4P 2Y3  
416-824-7377  
[Max.nokhrin@telna.com](mailto:Max.nokhrin@telna.com)

**Assignee:**

Mr. Rajiv Jagota  
President  
G3 Telecom USA Inc.  
1039 McNicoll Avenue  
Toronto, Ontario  
Canada M1W 3W6  
Tel: 416-494-5893  
Email: [rjagota@telehop.com](mailto:rjagota@telehop.com)

**Consultant for Assignor and Assignee:**

Sharon Thomas, Consultant  
Technologies Management, Inc.  
2600 Maitland Center Parkway, Suite 300  
Maitland, FL 32751  
Phone: 407-740-3031  
Email: [stthomas@tminc.com](mailto:stthomas@tminc.com)

**Section 63.18(d) – Prior Section 214 authority**

Neither Telehop Communications Inc. or G3 Telecom USA Inc. have previously received authority under Section 214 of the Act other than the existing authorization described herein that is the subject of this application (ITC-214-20110311-00063).

**Answer to Question 11:**

**Section 63.18(h) – Assignee ownership**

Mr. Rajan Arora  
6 Tranvalley Crt.  
Toronto, Ontario  
Canada M3B 1C6  
Citizenship: Canada  
Principle Business: Investor  
Ownership Interest: 24.79%

Mr. James Estill  
23 Grange Street  
Guelph, Ontario  
Canada N1E 2T6  
Citizenship: Canada  
Principle Business: Investor  
Ownership Interest: 17%

**Answer to Question 12:**

Assignee is owned by Telehop Communications Inc. which is a foreign carrier (Canadian), but has no interlocking directorates with any other foreign carrier, other than its affiliated entities identified in Section II.B of Attachment II to this Application. All of these entities have the same officers and directors as the Assignee.

**Answer to Question 13:**

Pursuant to a Purchase Agreement ("Agreement") between the Joint Applicants, Telna proposes to sell a subset of its U.S. long distance customer base to G3, which will become the service provider for the U.S. resold long distance telecommunications services that the customers currently receive from Telna. These customers represent Telna's entire long distance customer base in the respective states. Upon closing of the transaction, Telna will discontinue its intrastate, interstate and international resold long distance service offerings in those states. However, the Telna wishes to retain its international 214 authorization under File No. ITC-214-20031031-00499.

**Answer to Question 14:**

G3 a U.S. carrier, but is wholly owned by Telehop Communications Inc. which is a foreign carrier in Canada.

**Answer to Question 15:**

The Assignee, G3 Telecom USA currently provides international telecommunications services to Canada, where its parent, Telehop, is authorized to engage in the provision of international telecommunications service to the public and is, therefore, defined as a foreign carrier under 47 CFR §63.09(d).

**Answer to Question 16:**

G3 satisfies the requirements of §63.10(a)(3) for a presumption of non-dominance and therefore qualifies for regulation as a non-dominant carrier for the provision of international telecommunications service to Canada. G3's foreign parent, Telehop, lacks sufficient market power in Canada to adversely affect competition in the U.S. market. Telehop does not own any transport facilities and does not provide local access services in Canada. Accordingly, Telehop has a 0% share of the international and local access markets in Canada. Accordingly, G3 meets the standard for presumptive classification as a non-dominant carrier under §63.10(a)(3).

**Answer to Question 20:**

Applicants respectfully submit that this Application is eligible for streamlined processing pursuant to §63.12(a)-(b). Although G3's parent company, Telehop, is a foreign carrier in a destination market (Canada), G3 qualifies for a presumption of non-dominance under §63.10(a)(3), for the reasons describe in Section V(m) above, and therefore satisfies the exemption provided under §63.12(c)(1)(ii). Furthermore, G3 satisfies the exemption set forth in §63.12(c)(1)(iii), because its affiliated foreign parent, Telehop, does not own facilities, other than mobile wireless facilities and switches, in Canada, the destination market. The provisions of §63.12(c)(2) do not apply to G3, because it does not have an affiliation with a dominant U.S. carrier. Moreover, in conjunction with its 214 Transfer of Control Application, File No. ITC-T/C-20140513-00150, G3 and its parent company, Telehop, were subject to a thorough review by the Executive Branch Agencies ("Team Telecom"). The Applicants therefore respectfully request that the Application be afforded streamlined processing.